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Attorney for Defendant  
LANCE M. LAURENDINE

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LANCE M. LAURENDINE,

Defendant.

NO. 1:05-CR-00045 OWW

STIPULATION RE: PROTECTIVE ORDER  
AND ORDER

Judge: Hon. Oliver W. Wanger

**IT IS HEREBY STIPULATED** by and between the parties hereto through their respective counsel that digital discovery, including but not limited to two hard drives, shall be provided to defense expert Dave Townsend, by the F.B.I. for examination pursuant to terms in the Protective Order as set forth herein.

DATED: August 31, 2005

McGREGOR W. SCOTT  
United States Attorney

/s/ David L. Gappa  
DAVID L. GAPPA  
Assistant United States Attorney  
Attorney for Plaintiff

DATED: August 31, 2005

QUIN DENVIR  
Federal Public Defender

/s/ Ann H. Voris  
ANN H. VORIS  
Assistant Federal Defender  
Attorney for Defendant

**ORDER**

**IT IS HEREBY ORDERED:**

Any digital discovery provided by the government under its discovery obligation, shall not be reproduced by any party. This includes reproducing the discovery in digital form.

No party shall transfer any of the digital discovery to any source including other computers or digital storage devices, except to the extent necessary to conduct a forensic analysis of the defendant's computer, hard drive(s), operating system, and related storage media.

The digital discovery shall not be transmitted in any manner, including via the United States Mail or the internet.

All parties shall take all steps necessary to prevent the public dissemination of the digital discovery provided in this case.

This order allows the defense expert to access the electronic discovery only for the purpose of determining whether the defendant has a viable defense that his computer was "hacked," i.e., that someone other than the defendant is responsible for placing images of child pornography on the defendant's computer, computer hard drive(s), and/or related storage media.

The defense expert shall not knowingly access, copy or otherwise duplicate any material within the discovery that is or may fall within the attorney-client privilege. Further, if a defense expert accesses such material, he shall not discuss or disclose that material with anyone else, including the defendant and the attorney for the defendant.

Defense counsel and his representative, including any designated expert, shall return all digital discovery to the government at the conclusion of the assessment of the defendant's defense. This will be without prejudice to seek an additional protective order should the defendant decide to proceed to trial and need expert assistance in preparation of his defense.

**SO ORDERED.**

Dated: September 7, 2005

/s/Oliver W. Wanger  
OLIVER W. WANGER, Judge  
United States District Court  
Eastern District of California